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8 IN THE UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA  
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 APPROXIMATELY \$879,643.00 IN  
U.S. CURRENCY,

15 ASSORTED MONEY ORDERS VALUED  
16 AT \$6,000.00 IN U.S. CURRENCY,

17 Defendants.  
18

2:21-MC-00097-MCE-KJN

STIPULATION AND ORDER EXTENDING TIME  
FOR FILING A COMPLAINT FOR FORFEITURE  
AND/OR TO OBTAIN AN INDICTMENT  
ALLEGING FORFEITURE

19 It is hereby stipulated by and between the United States of America and potential claimants Maria  
20 Gonzalez Sanchez and Jose Luis Mendoza Castillo (“claimants”), by and through their respective  
21 counsel, as follows:

22 1. On or about January 3, 2021 and January 11, 2021, claimants filed claims in the  
23 administrative forfeiture proceeding with the Federal Bureau of Investigation with respect to the  
24 Approximately \$879,643.00 in U.S. Currency and Assorted Money Orders valued at \$6,000.00 in U.S.  
25 Currency (hereafter collectively “defendant funds”), which were seized on or about October 1, 2020.

26 2. The Federal Bureau of Investigation has sent the written notice of intent to forfeit required  
27 by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a  
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1 claim to the defendant funds under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimants has  
2 filed a claim to the defendant funds as required by law in the administrative forfeiture proceeding.

3 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for  
4 forfeiture against the defendant funds and/or to obtain an indictment alleging that the defendant funds are  
5 subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture  
6 proceeding, unless the court extends the deadline for good cause shown or by agreement of the parties.  
7 That deadline was April 2, 2021.

8 4. By Stipulation and Order filed April 12, 2021, the parties stipulated to extend to July 1,  
9 2021, the time in which the United States is required to file a civil complaint for forfeiture against the  
10 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

11 5. By Stipulation and Order filed July 21, 2021, the parties stipulated to extend to August 30,  
12 2021, the time in which the United States is required to file a civil complaint for forfeiture against the  
13 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

14 6. By Stipulation and Order filed August 31, 2021, the parties stipulated to extend to  
15 September 29, 2021, the time in which the United States is required to file a civil complaint for forfeiture  
16 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to  
17 forfeiture.

18 7. By Stipulation and Order filed October 1, 2021, the parties stipulated to extend to  
19 November 29, 2021, the time in which the United States is required to file a civil complaint for forfeiture  
20 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to  
21 forfeiture.

22 8. By Stipulation and Order filed December 6, 2021, the parties stipulated to extend to  
23 January 28, 2022, the time in which the United States is required to file a civil complaint for forfeiture  
24 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to  
25 forfeiture.

26 9. By Stipulation and Order filed February 4, 2022, the parties stipulated to extend to March  
27 29, 2022, the time in which the United States is required to file a civil complaint for forfeiture against the  
28 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

1           10. By Stipulation and Order filed March 31, 2022, the parties stipulated to extend to May 27,  
2 2022, the time in which the United States is required to file a civil complaint for forfeiture against the  
3 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

4           11. By Stipulation and Order filed May 27, 2022, the parties stipulated to extend to July 26,  
5 2022, the time in which the United States is required to file a civil complaint for forfeiture against the  
6 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

7           12. By Stipulation and Order filed July 28, 2022, the parties stipulated to extend to September  
8 23, 2022, the time in which the United States is required to file a civil complaint for forfeiture against the  
9 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

10           13. By Stipulation and Order filed September 27, 2022, the parties stipulated to extend to  
11 October 24, 2022, the time in which the United States is required to file a civil complaint for forfeiture  
12 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to  
13 forfeiture.

14           14. By Stipulation and Order filed October 25, 2022, the parties stipulated to extend to  
15 December 23, 2022, the time in which the United States is required to file a civil complaint for forfeiture  
16 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to  
17 forfeiture.

18           15. By Stipulation and Order filed December 27, 2022, the parties stipulated to extend to  
19 January 23, 2023, the time in which the United States is required to file a civil complaint for forfeiture  
20 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to  
21 forfeiture.

22           16. By Stipulation and Order filed January 25, 2023, the parties stipulated to extend to  
23 February 22, 2023, the time in which the United States is required to file a civil complaint for forfeiture  
24 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to  
25 forfeiture.

26           17. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend  
27 to March 24, 2023, the time in which the United States is required to file a civil complaint for forfeiture

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1 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to  
2 forfeiture.

3 18. Accordingly, the parties agree that the deadline by which the United States shall be  
4 required to file a complaint for forfeiture against the defendant funds and/or to obtain an indictment  
5 alleging that the defendant funds are subject to forfeiture shall be extended to March 24, 2023.

6  
7 Dated: 2/21/2023

PHILLIP A. TALBERT  
United States Attorney

8  
9 By: /s/ Kevin C. Khasigian  
KEVIN C. KHASIGIAN  
Assistant U.S. Attorney

10  
11 Dated: 2/21/2023

/s/ Kenneth Rosenfeld  
KENNETH ROSENFELD  
Attorney for potential claimant  
Maria Gonzalez Sanchez


12  
13  
14 Dated: 2/21/2023

/s/ Allen N. Sawyer  
ALLEN N. SAWYER  
Attorney for potential claimant  
Jose Luis Mendoza Castillo

(Signatures authorized by phone)

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18 **IT IS SO ORDERED.**

19 Dated: February 22, 2023

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MORRISON C. ENGLAND, JR.  
SENIOR UNITED STATES DISTRICT JUDGE